

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

v.

ANNA GABRIELIAN and
JAMIE LEE HENRY,

Defendants.

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CRIMINAL NO. 1:22-336-SAG

MOTION TO MODIFY ANNA GABRIELIAN’S
CONDITIONS OF RELEASE

The Court Order setting Dr. Gabrielian’s conditions of release places her under home confinement, where she is “restricted to 24-hour-a-day lock-down at her current residence [in Rockville, Md] except for medical necessities, attorney visits, court appearances, or other activities specifically approved by the court.” ECF 10. Dr. Gabrielian’s trial begins on May 22, 2023 in Baltimore and is expected to last 8 days. Defense counsel will be staying in a hotel near the courthouse during the trial week. Dr. Gabrielian seeks Court permission to modify her conditions of release to allow her to stay with counsel in Baltimore Tuesday and Wednesday night to allow her to prepare with counsel for her potential testimony.

Defense counsel asked the position of both Government and pretrial services. The Government defers to pretrial services. Pretrial services has “consulted with the government and . . . will not be approving the overnight hotel stays without Court approval.”

Respectfully submitted,

SCHERTLER ONORATO MEAD & SEARS, LLP

/s/ Christopher Mead

Christopher Mead, Bar No. 08661

Noah Cherry, PRO HAC VICE

555 Thirteen Street, NW

Suite 500 West

Washington, DC 20004

Telephone: (202) 628-4199

Facsimile: (202) 628-4177

cmead@schertlerlaw.com

ncherry@schertlerlaw.com

Counsel for Anna Gabrielian

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of May 2023, a true and correct copy of the foregoing was electronically filed and served on counsel for the United States through ECF.

/s/ Noah Cherry